



Baker & Hostetler LLP

45 Rockefeller Plaza
New York, NY 10111

T 212.589.4200
F 212.589.4201
www.bakerlaw.com

Eric R. Fish
direct dial: 212.589.4647
efish@bakerlaw.com

September 16, 2021

VIA ECF

Honorable John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Mark Pruden v. Lemonade, Inc., et al.
Civil Action No. 1:21-cv-07070-JGK

Dear Judge Koeltl:

We represent Defendants Lemonade, Inc, Lemonade Insurance Company, Lemonade Insurance Agency, LLC, Lemonade Ltd., and Lemonade Life Insurance Agency, LLC (“Defendants”) in this matter. We write to respectfully request an extension of time to October 12, 2021 for Defendants to answer, move, or otherwise respond to Plaintiff’s complaint.

The summons and complaint were served on August 30, 2021. Therefore, the current deadline for a response is September 20, 2021. This is Defendants’ first such request for an extension, to which Plaintiff’s counsel consents.

My firm was recently retained to defend this matter, and the additional time will allow us to evaluate Plaintiff’s claims and determine how best to proceed. In addition, there are four consolidated putative class actions making similar allegations pending in the Northern District of Illinois, so the additional time also will allow us to assess how this case may relate to the others.

In light of the above, we respectfully request that Defendants’ request for an extension to October 12, 2021 to answer, move, or otherwise respond to the complaint be granted. Should Defendants decide to file a motion, we will submit a letter requesting a pre-motion conference on or before the new deadline in accordance with Your Honor’s Individual Practices unless Your Honor would prefer a motion be filed without a conference.

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Should Your Honor have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Eric R. Fish

Eric R. Fish

cc: Andrea Farah, Esq. (*via ECF*)
Christian Levis, Esq. (*via ECF*)
Amanda Fiorilla, Esq. (*via ECF*)